

# **EXHIBIT 20**

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION

4 IN RE: NATIONAL ) MDL No. 2804  
5 PRESCRIPTION OPIATE )  
6 LITIGATION, ) Case No.  
7 ) 1:17-MD-2804  
8 )  
9 THIS DOCUMENT RELATES TO ) Hon. Dan A.  
10 ALL CASES ) Polster  
11 )  
12 )  
13 )  
14 )  
15 )

16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
Wednesday, January 23, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
CONFIDENTIALITY REVIEW

Videotaped Deposition of SUSANNE  
HILAND, held at 4206 South J.B. Hunt Drive,  
Rogers, Arkansas, commencing at 8:25 a.m., on  
the above date, before Debra A. Dibble,  
Certified Court Reporter, Registered  
Diplomate Reporter, Certified Realtime  
Captioner, Certified Realtime Reporter and  
Notary Public.

GOLKOW LITIGATION SERVICES  
877.370.3377 ph | fax 917.591.5672  
deps@golkow.com

10 think we had access to some training, but we  
11 weren't members of HDMA, so -- so some of the

Page 124

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11 Q. And why, at that time, did  
12 Walmart decide that it needed additional  
13 monitoring of oxycodone 30s?

14 A. We had received information  
15 from a DEA agent that oxycodone 30 was on  
16 their radar to be -- I mean, just to kind of  
17 simplify.

18 That they had heightened  
19 concerns about oxycodone 30. During that  
20 meeting they indicated that Walmart was not a  
21 focus of the concerns that they had, but we  
22 wanted to proactively establish additional  
23 due diligence to ensure that we didn't become  
24 part of the DEA's concern around oxy 30.

[REDACTED]

13           A.       This was part of efforts that  
14           we had ongoing. This was in the -- kind of  
15           in the same time frame that we were hearing  
16           about the oxy 30 issues from the DEA. I know  
17           that there were actions taken against some of  
18           our competitors around their dispensing  
19           habits, and so we were seeing the issues  
20           related to opioid use continuing to rise,  
21           just coming from an environmental scan.

22           Q.       Did you say opioid use or  
23           opioid abuse?

24           A.       I meant abuse, if ...

25           Q.       So the reason why, in August of

1       2012, you believe the matter was urgent was  
2       because of the conversations you had had with  
3       the DEA regarding oxy 30 and the fines and  
4       penalties that were leveled against folks who  
5       were similarly situated to Walmart in the  
6       dispensing and distribution of opioids.

7                       MS. TABACCHI: Object to the  
8       form.

9                       THE WITNESS: Really what we  
10       were -- what we were seeing as a  
11       continuing issue related to the opioid  
12       abuse.

13       Q.       (BY MR. INNES) Okay. And you  
14       mentioned that the DEA told you that they  
15       weren't focused on Walmart in particular for  
16       oxy 30s at that point in time; right?

17       A.       That is correct.

18       Q.       And these actions that you  
19       referenced were brought against companies  
20       other than Walmart? That's right?

21       A.       Correct.

■           ■       ██  
■       ██  
■       ██  
■       ██